

States LCR Resource Needs & Trainings February 2017

Summary: Over the past year, EPA staff have worked with all state drinking water programs on SDWA implementation issues, with a focus on the Lead and Copper Rule. Nearly every state program has expressed concern about their level of resources and technical expertise to address critical drinking water issues such as corrosion control.

Background:

Throughout 2016, EPA actively engaged with state programs to identify challenges in the implementation of the Lead and Copper Rule (LCR). As part of these efforts, EPA sent letters on February 29, 2016, to state commissioners requesting information regarding implementation of LCR regulations in their state. All state commissioners responded. Challenges with LCR implementation that state commissioners most frequently raised with EPA included the following:

- Challenges in reviewing corrosion control studies and establishing required water quality parameters for corrosion control treatment for drinking water systems within their state,
- Challenges in determining the appropriate residential drinking water sampling sites for lead, including the location of lead service lines,
- The challenge of implementing drinking water regulations for over 100 contaminants with dwindling resources. Commissioners suggested that EPA provide adequate resources to state programs, strengthening the EPA and State co-regulatory partnership and increasing EPA's training and technical assistance to states. A report released in December 2013 by the Association of State Drinking Water Administrators (ASDWA) documents a yearly shortfall of at least \$230 million between the resources available in states (from all sources – both federal and state) and those needed by states to administer minimum required programs.

Overall, the primacy agencies highlighted action items that both EPA and the primacy agencies should consider to ensure sustainability of public water systems. These include:

- Ensuring adequate and sustained investment in state programs to ensure adequate oversight,
- Using information technology to enhance transparency and accountability,
- Leveraging funding to finance water infrastructure replacement and rehabilitation
- Creating a one stop technology and assistance center for all state drinking water programs.

EPA also worked directly with states to understand the causes of the 2,400 lead action level exceedances in the nation's drinking water systems, as well as follow-up actions taken after each exceedance. EPA's analysis demonstrated that many states and water systems had not taken the required follow-up actions, such as setting water quality parameters or installing corrosion control. State staff raised limitations in state expertise as one reason for actions not being taken. As a result of these discussions, EPA developed and conducted multiple face to face trainings for state staff on corrosion control.

2016 LCR Training & Technical Assistance to State Drinking Water Programs:

- EPA released the "Optimal Corrosion Control Evaluation Technical Recommendations for States and Public Water Systems." (April 2016). EPA hosted ten face-to-face regional training workshops, leveraging the most recent guidance, to discuss optimal corrosion control treatment (OCCT).
 - The workshops addressed technical considerations related to OCCT, including hands-on exercises

for making informed decisions about corrosion control treatment.

- The States provided the following suggestions for the development of future workshops:
 - updating materials evaluations and identification of tier 1 sampling sites
 - best practices in meeting public education requirements under the LCR
 - basic water chemistry to support establishing optimal CCT, and
 - best practices to improve residents' willingness and ability to collect LCR samples.
- The States also provided suggestions regarding future tools:
 - OCCT Online Templates with decision tree
 - User-friendly LCR Sampling Instructions for residents
 - List of successful residential participation strategies
 - Sampling for lead manual that describes the many types of samples for lead
 - Tools to support identification of lead service lines
 - Get-the-Lead-Out national campaign targeted to operators and homeowners

In addition, ASDWA provided the following suggestions on behalf of the states:

- Workshops on identification of Sampling Sites
- Public Education Workshops: Work with AWWA and ASDWA to provide tools to overcome obstacles systems face in fulfilling the public education-related requirements of the LCR
- Continue to offer in person trainings that focuses on compliance with the OCCT and WQP.